

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: Elton X. Tinsley,	)	Chapter 7
	)	
	)	No. 22-bk-13571
	)	
Debtor.	)	Judge LsShonda A. Hunt

**JANE DOE’S MEMORANDUM IN SUPPORT OF HER OBJECTION TO DISCHARGE**

NOW COMES Creditor, Jane Doe, by her attorney, Eugene Murphy of the Murphy Law Group, pursuant to USC Title 11, Chapter 5, Sub-Chapter II, Section 523(a)(6), and for her Memorandum in Support of Her Objection to the Discharge of any indebtedness Debtor, Elton X. Tinsley, M.D., may have to her states as follows:

1. Movant, Jane Doe, is listed as a creditor of Elton X. Tinsley, M.D., both as “Jane Doe,” through her former attorneys, the Law Offices of Sandman, Levy, and Petrich, and by her legal name, Victoria Williams.

2. By virtue of this proceeding, Debtor, Elton X. Tinsley, M.D., seeks to discharge any debt he may owe, now or in the future, to Movant, pursuant to USC Title 11, Chapter 5, Sub-Chapter II, Section 727.

3. Movant is listed as a creditor of Elton X. Tinsley, M.D., by virtue of a pending lawsuit she filed against him in the Circuit Court of Cook County, Illinois, Court Number 2020 L 007196, a copy of Movant’s file stamped Complaint at Law therein is attached hereto as Exhibit A.

4. Movant’s civil litigation against Elton X. Tinsley, M.D., is currently stayed in the Circuit Court of Cook County, Illinois, as a result of this bankruptcy filing, and no judgment has yet been entered against him.

5. As detailed in paragraphs 11 through 17 of Exhibit A, Movant's cause of action against Elton X. Tinsley, M.D., arises from his drugging, raping, and impregnating her while she was a patient of his.

6. Section 523(a)(6) of USC Title 11, Chapter 5, Sub-Chapter II states:

§523. Exceptions to discharge:

(a) A discharge under section 727, 1141, 1192, 1228(a), 1228(b), or 1328(b) of this title does not discharge an individual debtor from any debt -

(6) for willful and malicious injury by the debtor to another entity or to the property of another entity.

7. Movant's allegations, as set forth in Exhibit A, satisfy the requirements of §523(a)(6), above, in that they arise from willful and malicious injury by Debtor, Elton X. Tinsley, M.D., against Movant.

8. Accordingly, any debt that Elton X. Tinsley, M.D., may now or in the future have to Movant, arising from the facts set forth in her civil cause against him (Exhibit A), is not dischargeable in bankruptcy.

WHEREFORE, Movant, Jane Doe, objects to the discharge of any indebtedness Debtor, Elton X. Tinsley, M.D., may have to her, arising from her civil cause of action against him, and prays this honorable Court find that any financial obligation Elton X. Tinsley, M.D., may owe to her arising from the facts and circumstances asserted in her said civil litigation against him are not dischargeable under the Bankruptcy Code, and for such further and other relief as the Court may deem just.

S/ Eugene E. Murphy, Jr.  
Eugene Murphy

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